

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to: <i>Burnett, et al. v. Islamic Rep. of Iran, et al.</i> , No. 15-cv-9903 (GBD)(SN); <i>Arias, et al. v. Islamic Rep of Iran</i> , No. 19-cv-41 (GBD)(SN)	

**PLAINTIFFS' NOTICE OF MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT  
JUDGMENTS ON BEHALF OF BURNETT/IRAN AND ARIAS PLAINTIFFS  
IDENTIFIED AT EXHIBITS A-1 AND A-2 WHO WERE NOT IMMEDIATE FAMILY  
MEMBERS OF A 9/11 DECEDENT**

**(BURNETT/IRAN XXV)**

PLEASE TAKE NOTICE that upon the accompanying Declaration of John M. Eubanks (“Eubanks Declaration”), with Exhibits A through P, and the accompanying memorandum of law, the Plaintiffs identified in Exhibits A-1 and A-2 (collectively “the Burnett/Iran XXV Plaintiffs”) to the Eubanks Declaration, respectfully move this Court for an Order entering partial final default judgments against The Islamic Republic of Iran, the Islamic Revolutionary Guard Corps, and the Central Bank of the Islamic Republic of Iran (collectively, “the Iran Defendants”) for the Plaintiffs identified in Exhibit A-1 and against The Islamic Republic of Iran for the Plaintiff identified in Exhibit A-2 and awarding the Burnett/Iran XXV Plaintiffs (1) solatium damages for the losses they each suffered as a functional equivalent of an “immediate family member” of their decedents (as indicated in Exhibits A-1 and A-2 to the accompanying Declaration of John M. Eubanks) in the same per plaintiff amounts previously awarded by this Court to various similarly situated plaintiffs; (2) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and (3) permission for the

Burnett/Iran XXV Plaintiffs to seek punitive damages, economic damages, or other damages at a later date, and for all other Plaintiffs not appearing on Exhibits A-1 or A-2, to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

The Plaintiffs identified on Exhibit A-1 make their request in connection with the judgment of default as to liability entered against the Iran Defendants on January 31, 2017. *See* 15-cv-9903 ECF No. 85. The Plaintiff identified on Exhibit A-2 makes her request in connection with the judgment of default as to liability entered against The Islamic Republic of Iran on September 9, 2019. *See* ECF No. 5104.

Dated: May 12, 2022

Respectfully submitted,

MOTLEY RICE LLC

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